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**TO: Economic Support Supervisors
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W-2 Agencies**

**FROM: Amy Mendel-Clemens
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BHCE/BWP OPERATIONS MEMO

No.: 03-27

Date: 04/14/2003

Non W-2 ☐ W-2 ☐ CC ☒

PRIORITY: HIGH

SUBJECT: Change in Child Care Monitoring Reporting Requirement

CROSS REFERENCE: Administrators Memo 01-23
BPS Operations Memo 02-13

EFFECTIVE DATE: Immediately

PURPOSE

This memo provides information regarding the suspension of the child care monitoring reporting requirement and addresses concerns expressed by local agencies regarding the use of the "95-100% Attendance at Provider" report.

BACKGROUND

THE MONITORING FINDINGS REPORT

BPS Operations Memo 02-13 required agencies to complete and submit the Monitoring Findings Report (DWSW-12871-E) to the DWS Regional Offices on a quarterly basis. The intent of this policy was for regional staff to review the Monitoring Findings Report to ensure that agencies were providing the level of monitoring as described in their monitoring plans. The Monitoring Findings Report was also forwarded to the Child Care Section in order to track any trends in overpayment issues.

USE OF THE "95-100% ATTENDANCE AT PROVIDER" REPORT

Local agency staff and child care providers have indicated concerns in the use of the EOS Report (CC32) "95-100% Attendance at Provider". The intent of the report was to identify providers that may be over reporting hours of attendance. Local agency staff indicated that upon reviewing attendance documentation, the providers' attendance records are representative of the hours reported for attendance for subsidy payment. Local agency staff have reported that the process to compare hours reported on attendance reports to the provider's attendance records is resource intensive for both the agency and the provider. Providers feel as though the local agency is accusing them of dishonesty. And, in the end, very few discrepancies are found. This memo will provide guidance in the use of the "95-100% Attendance at Provider" report as well as explore alternative options for monitoring over reporting of attendance other than the use of the report.

POLICY

TEMPORARY SUSPENSION OF THE COMPLETION OF THE MONITORING FINDINGS REPORT

Due to reduced resources being experienced by local agencies and the state, effective immediately, local agencies are no longer required to complete and submit the Monitoring Findings Report. This is effective with the April 2003 Monitoring Findings Report to the regional office. This change remains in effect until further notice.

NOTE ➤ Local agencies are still required to continue their monitoring efforts according to their monitoring plans.

USE OF THE 95-100% ATTENDANCE AT PROVIDER REPORT

Problems regarding the use of this report have been identified. The intent of the "95-100% Attendance at Provider" report is to identify providers who may be over reporting the actual hours of attendance. Local agencies indicate that very few discrepancies between the provider's attendance records and the reported attendance have been found. They have also indicated that the providers do not like the accusatory tone of the letters they receive when they appear on the report.

A number of suggestions have been made by local agency staff to monitor over reporting other than the use of the "95-100% Attendance at Provider" report:

- At the time of child care eligibility review, the worker should compare the hours of work on the check stub with the reported hours of attendance. Hours of attendance can be found on screens CCAR, CCWA (CCPI web attendance) and CCUC.
- Review reported hours of attendance using CCAR, CCWA (CCPI web attendance) or the paper attendance report form. If all of the children are listed as being in care the exact hours that are authorized, it may be an indication that the provider is not reporting the actual of hours of attendance.

AGENCY ACTION

Please take the following actions:

1. If your agency uses the 95-100% Attendance at Provider report, review the overall success in identifying over reporting issues. If using this report has not identified providers that are over reporting attendance, discontinue use of this method and choose another to monitor for over reporting. Adjust the agency-monitoring plan as necessary.
2. Review the letter (even if it is the letter that the Child Care Section created) that your agency is sending to providers who appear to be over reporting. Adjust the tone of the letter so that it is less accusatory. The initial letter should be sent in the spirit of providing technical assistance on attendance reporting.
3. Once you have monitored a provider's records, and the provider appears to be reporting hours of attendance accurately, do not require that provider to continue sending in attendance verification. Simply continuing to appear on the 95-100% Attendance at Provider report is not considered enough to continue close scrutiny of the provider's attendance reporting if the provider has been able to show the attendance reporting is in compliance.

ISSUE REPORTED WITH THE 95-100% ATTENDANCE AT PROVIDER REPORT

The report displays "Total Hours Used" for an attendance period. It has recently been discovered that the "Total Hours Used" includes attendance recorded for attendance periods included in the report period as well as attendance recorded during the report period for attendance periods that are not included in the report period. This has the potential impact of inflating the "Total Hours Used" for a report period. Please be aware of this when you use this report. There are no plans to change this logic at this time.

Example: The report period is 12-22-02 and 2-15-03. Attendance entered for attendance periods that fall within the report period of 12-22-02 to 2-15-03 is included in the "Total Hours Used". Attendance that was entered between 12-22-02 and 2-15-03 for the attendance week of 12/8/02 to 12/21/02 would also appear in the "Total Hours Used" in the report.

REVIEW CHILD CARE MONITORING PLANS

Local agencies are encouraged to review their monitoring plan periodically and update them as necessary based on monitoring efforts that they can reasonably support. When a monitoring plan is adjusted, it should be sent to the regional office for review and approval.

CONTACTS

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Note: Email contacts are preferred. Thank you.

DWD/DWS/BDS/RB